REMARKS

Claims 1-37 were presented for examination and were rejected. Applicants are hereby amending claims 1, 5, 17, 26, 30, 35, and 36; and canceling claim 24. Support for all amendments is found in the application as originally filed. Reconsideration of this application as amended, and allowance of all claims remaining herein, claims 1-23 and 25-37 as amended, are hereby respectfully requested.

In his sixth paragraph, the Examiner objected to the specification for failing to provide proper antecedent basis for the expression "computer-readable medium" that appears in claims 1-36. Applicants are hereby deleting this expression from their claims. Therefore, Applicants request the Examiner to withdraw his objection to the specification.

In his seventh paragraph, the Examiner objected to claims 23 and 24 as being of improper dependent form for failing to further limit the subject matter of a previous claim.

Applicants traverse this objection with respect to claim 23. Claim 23 introduces the new recitation of "filtering rules." Filtering rules are not recited in claim 1.

Applicants are hereby canceling claim 24.

For the above reasons, Applicants hereby request the Examiner to withdraw his objection to claims 23 and 24; and to allow claim 23 as amended.

In his ninth paragraph, the Examiner rejected claims 1-36 under 35 U.S.C. §101 on grounds that the claimed invention is allegedly directed to non-statutory subject matter.

As discussed above, Applicants are hereby deleting the expression "computer-readable medium" from claims 1-36, and are expressly reciting the Web server, a hardware element, in these claims. Much as the Examiner has found that claim 37 passes muster under 35 U.S.C. §101, claims 1-36 are now in the same form as claim 37.

For the above reasons, Applicants hereby request the Examiner to withdraw his rejection of claims 1-36; and to allow these claims as amended.

In his eleventh paragraph, the Examiner rejected claims 1-9, 23-25, 28, 29, and 31-34 under 35 U.S.C. §103(a) as being unpatentable over Nguyen in view of Linehan.

Presumably, the Examiner should have included claim 37 as part of this rejection, given the fact that he rejected claim 37 in his thirty-first paragraph, which is a subset of his eleventh paragraph.

With respect to the rejection of claim 1, Applicants traverse the Examiner's statement that Nguyen discloses the identification of "which HTTP requests require additional user authentication information, such as usernames and passwords." The passage of Nguyen cited by the Examiner, column 16 lines 7-15, shows that in Nguyen the password is always present (assuming that the underlying pre-established offline protocol provided that passwords be present). There is no module in Nguyen, Linehan, or any combination thereof, that decides whether something needs to be authorized or not, much less authorized by a digital signature affixed by the buyer computer as recited in Applicants' claim 1.

Furthermore, in his twelfth paragraph, second subparagraph, the Examiner refers to a block 170 in Figure 1B of Nguyen. There is no block 170 in Figure 1B of Nguyen.

Further, in his twelfth paragraph, fourth subparagraph, the Examiner equates Nguyen's block 2110 with Applicants' Internet server application, citing Nguyen column 71 lines 8-52. Item 2110 is not mentioned in this passage of Nguyen.

The Examiner also cites (in his twelfth paragraph, fifth subparagraph) the same passage for Nguyen's item 2124, which the Examiner equates with Applicants' filter engine. Item 2124 is not mentioned at this passage.

Applicants traverse the Examiner's statement made in his fifteenth paragraph that Linehan states "that providing alternate authentication mechanisms results in a significant reduction in complexity, thereby improving the case [meaning "ease"] of implementation and overall performance." Linehan does not say that. Linehan says that moving the credit/debit card authentication function from the merchant to the issuer is what results in a significant reduction in complexity. Col. 4 lines 2-9. Providing alternate authentication mechanisms results in an increase, not a decrease, in complexity.

In sum, the last clause of Applicants' claim 1 is not suggested by the cited references, whether these references are considered alone or together.

Claims 2-9, 23-25, 28, 29, and 31-34 are all dependent claims, depending upon independent claims 1 and 30, respectively. Therefore, the patentability of these claims flows from the patentability of their parent independent claims.

Further with respect to the rejection of claim 2, Applicants traverse the Examiner's statement that <u>Nguyen</u> "discloses the filter engine is further adapted to identify HTTP requests that require accessing a service offered by the seller's bank and to formulate requests for the service". Identification implies decision-making. In <u>Nguyen</u>, the only decision-making that is disclosed is that forward converter 2124 decides if a request is an original request, an honest retry attempt, or a replay attack. Col. 70 lines 54-56.

In his sixteenth paragraph, the Examiner appears to equate block 2102 with Applicants' filter engine. This is inconsistent with the Examiner's previous position, as enunciated in his twelfth paragraph, fifth subparagraph, wherein the Examiner equates <u>Nguyen</u>'s item 2124 with Applicants' filter engine.

Further with respect to claim 2, Applicants traverse the Examiner's statement that <u>Nguyen</u> shows a bank interface that is adapted to reformat requests from the filter engine. <u>Nguyen</u>'s payment gateway system 140 does not reformat anything. Col. 15 lines 51-63.

Finally with respect to claim 2, the Examiner cites <u>Nguyen</u> column 15 lines 51-63 for a discussion of a bank interface. However, no bank interface is mentioned at this passage of <u>Nguyen</u>.

With respect to the rejection of claim 3, <u>Nguyen</u>'s column 15 lines 51-63 cited by the Examiner does not mention a filter engine, nor does it mention what the Examiner has previously characterized as <u>Nguyen</u>'s analogue to Applicants' filter engine (i.e., items 2102 or 2124).

With respect to the rejection of claim 8, the Examiner cites Nguyen column 12 lines 28-65. However, this passage does not mention the ISAPI which is the subject of claim 8.

With respect to the rejection of claim 9, Applicants traverse the Examiner's statement that Nguyen teaches that the Internet server application is adapted to generate HTTP responses. HTTP responses are not mentioned in the two passages of Nguyen cited by the Examiner.

With respect to the rejection of claim 23, Applicants traverse the Examiner's statement that Nguyen teaches that the filter engine determines whether an HTTP request contains data requiring authentication information, such as a username and password. The passage of Nguyen cited by the Examiner, col. 16 lines 7-15, shows that in Nguyen the password is always present (assuming that the underlying pre-established offline protocol provided that passwords be present).

Also, the filtering rules of claim 23 are not disclosed in either of the cited references.

With respect to the rejection of claim 25, Applicants traverse the Examiner's statement that Nguyen teaches that the filter engine is programmed to recognize HTTP requests transmitted by the Web browser that have been modified to include a special tag. A special tag is not mentioned in the passage of Nguyen cited by the Examiner (col. 16 lines 7-15).

With respect to the rejection of claim 28, Applicants traverse the Examiner's statement that Nguyen teaches a filter engine providing an abstracted front end interface via an object oriented computer programming language remote method invocation. The passage of Nguyen

cited by the Examiner does not mention a filter engine, an abstracted front end interface, or a remote method invocation.

With respect to the rejection of claim 29, Applicants traverse the Examiner's statement that <u>Nguyen</u> teaches a filter engine employing a rules class. The passage of <u>Nguyen</u> cited by the Examiner does not mention a filter engine or a rules class.

With respect to the rejection of claim 31, Applicants traverse the Examiner's statement that <u>Linehan</u> teaches a bank interface designed with a plug-in based architecture. The passage of <u>Linehan</u> cited by the Examiner does not mention a plug-in based architecture.

With respect to the rejection of claim 32, Applicants traverse the Examiner's statement that <u>Linehan</u> teaches a bank interface supporting an abstract front-end interface to allow communication via a plurality of middleware technologies. <u>Linehan</u> never says this about his acquirer gateway 206 (the analogue to Applicants' bank interface) anywhere.

With respect to the rejection of claim 33 and 34, Applicants traverse the Examiner's statement that <u>Linehan</u> teaches a bank interface adapted to create and transmit OCSP requests or some type of a certificate status check module. <u>Linehan</u> does not mention an OCSP request or a certificate status check module.

With respect to the rejection of claim 37, Applicants traverse the Examiner's statement that <u>Nguyen</u> identifies which HTTP requests from a buyer require authentication information of the buyer and which HTTP requests do not require authentication information of the buyer. The passage of <u>Nguyen</u> cited by the Examiner does not disclose or suggest this feature.

Further with respect to the rejection of claim 37, Applicants traverse the Examiner's statement that Nguyen creates a Web page for transmission to a browser controlled by the buyer, said Web page causing the browser to invoke a signing interface, said signing interface comprising a smart card containing a private key associated with the buyer. The passage of Nguyen cited by the Examiner does not show a Web page being created and sent to a browser.

Further with respect to the rejection of claim 37, Applicants traverse the Examiner's statement that Nguyen identifies which HTTP requests require a service provided by an entity other than the seller and which HTTP requests do not require a service provided by an entity other than the seller. The two passages of Nguyen cited by the Examiner do not show this feature. Identification implies decision-making. The only decision-making in Nguyen is mentioned at Nguyen column 70 lines 54-56, wherein forward converter 2124 decides if a request is an original request, an honest retry attempt, or a replay attack.

Further with respect to the rejection of claim 37, Applicants traverse the Examiner's statement that Nguyen shows an interface module coupled to the Web application and also located at the seller's Website. Nguyen's payment gateway computer system 140 is not located at the seller's Website 130. Fig. 3.

Further with respect to the rejection of claim 37, Applicants traverse the Examiner's statement that Nguyen shows an interface module adapted to receive from Web application requests for service from entities other than the seller. In the passage of Nguyen cited by the Examiner, the requests come from merchant computer system 130, i.e., the seller. Col. 15 lines 51-63.

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Further with respect to the rejection of claim 37, Applicants traverse the Examiner's statement that Nguyen shows an interface module which formats and transmits the requests. This feature is not shown in the passage of Nguyen cited by the Examiner, col. 15 lines 51-63.

Further with respect to the rejection of claim 37, Applicants traverse the Examiner's statement that Linehan states "that providing alternate authentication mechanisms results in a significant reduction in complexity, thereby improving the case [meaning "ease"] of implementation and overall performance." As stated above, Linehan states that moving the credit/debit card authorization function from the merchant to the issuer is what results in a significant reduction in complexity. Col. 4 lines 2-9. Providing alternate authentication mechanisms results in an increase, not a decrease, in complexity.

For the above reasons, Applicants hereby request the Examiner to withdraw his rejection of claims 1-9, 23-25, 28, 29, and 31-34; and to allow claims 1-9, 23, 25, 28, 29, 31-34, and 37 as amended.

In his thirty-fifth paragraph, the Examiner rejected claims 10-16 under 35 USC §103(a) as being unpatentable over Nguyen in view of Linehan, and further in view of Lin.

Claims 10-16 are dependent claims depending upon independent claim 1, which, as discussed above, is patentable. Therefore, it follows that claims 10-16 are patentable as well.

Furthermore, while Lin shows the use of a hash table, the purpose of Lin's hash table is different than the purpose of the hash table in Applicants' claims 10-16. Lin's hash table is used by an intermediate-tier server, not a server at a seller Web site as required by Applicants' claims,

to authenticate a client that is attempting to gain access to a remote data repository. See Lin's

Abstract; column 5 lines 14-15; and column 6 lines 60-62. In the present invention, on the other

hand, the hash table is sent by an Internet server application located at a seller's Web site to a

filter engine, also located at the seller's Web site, in order to help the filter engine identify those

HTTP requests that contain data requiring a digital signature by the buyer computer, as recited in

claim 1.

Furthermore, there is no suggestion in Lin of a seller, a buyer, an Internet server

application, or a filter engine, all of which are prominently recited in Applicants' claims.

Therefore, Lin is a remote reference. There is no motivation, teaching, or suggestion for a skilled

artisan to combine Lin with the other cited references.

With respect to the rejection of claims 11-16, Applicants traverse the Examiner's

statement that Nguyen (did the Examiner mean Lin?) teaches that the hash table comprises

headers from a redirected HTTP request, a method of the redirected HTTP request, a

content-type of a redirected HTTP request, a buyer computer's IP address, actual data in a

redirected HTTP request, or a unique session ID. Neither Nguyen nor Lin shows these features.

For the above reasons, Applicants hereby request the Examiner to withdraw his rejection

of claims 10-16; and to allow these claims as amended.

Applicants believe that this application is now in condition for allowance of all claims

remaining herein, claims 1-23 and 25-37 as amended, and therefore an early Notice of Allowance

is respectfully requested. If the Examiner disagrees or believes that, for any other reason, direct

contact with Applicants' attorney would help advance the prosecution of this case to finality, he

is invited to telephone the undersigned at the number given below.

Respectfully submitted,

date of signature: *July 13, 2007*

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